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City of Hobart
Town Hall, Macquarie Street
GPO Box 503
Hobart TAS 7001

By email to: strategicplanning@hobartcity.com.au

Re: North Hobart Neighbourhood (Structure) Plan

To whom this may concern,

The Tasmanian Chapter of the Australian Institute of Architects (the Institute) would like to thank the City of Hobart for the opportunity to provide feedback on the draft North Hobart Neighbourhood (Structure) Plan (the Plan). The Institute is broadly supportive of the Plan.

The Institute applauds the City of Hobart for taking steps to ensure that the future of North Hobart is considered, well planned, and focuses on the value of good design and the benefits it affords the community in both the short- and long-term. Strategic planning, along with master planning, are both critical for high-quality outcomes that are well-thought out and provide long-term solutions. Good urban policy and design are key to delivering a built environment that can sustain our communities into the future.

The Institute encourages the appropriate densification of the neighbourhood in a way that enhances what makes the place special, with well designed and built solutions. The health and sustainability of our neighbourhoods and cities is of utmost importance, and the quality of the built environment contributes to the health and wellbeing of our communities. As noted by the World Health Organisation, 'healthy cities are places that deliver for people and the planet.'¹

The Institute has an Affordable Housing Policy², along with a Multi-Residential Standards Policy³, that encourage outcomes that provide a good quality of living for residents and suitable public amenity.

The Tasmanian Chapter team has reviewed the relevant documents and has prepared the following response. The response primarily focusses on the areas that pertain to the built environment, and is broken into sections, as outlined below.

GENERAL COMMENTS:

The Institute would like to commend the process that has guided the development of the Plan and acknowledges that much of the feedback that was provided in response to the North Hobart Neighbourhood Plan – Discussion Paper from 2023 has been incorporated into the Plan. The Institute applauds the fact that

¹ <https://www.who.int/europe/groups/who-european-healthy-cities-network/what-is-a-health-city>

² <https://www.architecture.com.au/wp-content/uploads/Affordable-Housing-Policy.pdf>

³ <https://www.architecture.com.au/wp-content/uploads/Multi-Residential-Standards-Policy.pdf>

the Plan utilises the expertise of an architect in its formulation. The document is clear, well laid out and easy to read, and it is pleasing to see examples of high-quality architecture used throughout. While the architects responsible for these examples are mostly referenced, which the Institute applauds, there are a few instances where images references have been missed, including on page 49, and on page 52, where the architect (Cumulus) is missing from the image credit, along with the architect missing from the image credit on page 56. The Institute is also pleased to see the acknowledgement of the global climate and biodiversity emergency, under the 'Climate ready Hobart' page at the front of the document.

The Institute supports the proposed masterplans for both the North Hobart Oval area and the Providence Valley Rivulet block, and notes that the design and problem-solving skills of architects are crucial to the development of these masterplans, along with future planning for Condell Place, and the next steps in the implementation of the Plan.

The Institute notes that the Plan references guidelines that are currently under development by the City of Hobart, including the Heritage Design Guidelines (p. 24, 58, 82, 131) and the Urban Design Guidelines (p. 82). The Institute would welcome the opportunity to provide input into these guidelines as they are being developed and prior to them being finalised.

Well Designed and Well Built

The Institute is pleased to see that the Plan promotes well designed built forms and urban fabric throughout the document and suggests that reference to this could also be made on page 17 where mixed-used development and medium density housing is noted, in relation to the vision for North Hobart for the next 20 years. The Institute suggests that the Plan promotes built outcomes that are not only well designed, but are also well built, as the quality of the outcome depends on both. Involving architects in the contract administration part of a project (while it is being built) can help ensure a quality build, as the architect observes conformity to the building contract documents as well as the quality of the outcome.

Heritage

The Institute strongly supports good design that responds to its context. Regarding heritage, any guidelines need to be consistent with the articles of the Burra Charter.⁴ This will ensure best practice standards for managing cultural heritage places in Australia. Any guidelines also need to be developed in conjunction with heritage professionals, architects, and consultants. National and interstate examples of such guidelines have been drafted at a state level by the relevant government architect, and in each case in collaboration with the Australian Institute of Architects. Variably they have been either prepared collaboratively with the peak state heritage agency or with their endorsement⁵.

With respect to terminology, the Institute has concerns about the interpretation and subsequent application of terms such as 'complement' within the current planning scheme, leading to built outcomes that are mimetic of heritage character, so rather than reflecting a contemporary context it encourages stylistic reference to historic architecture. The Institute promotes an approach where architects respond to history and context and innovate on, rather than imitate, existing heritage.

Viability

In consulting with Institute members who have worked with developers, feedback has been received about the feasibility of medium residential development. The Chapter has heard of instances where private developers have sought to create medium density developments (in one instance, in North Hobart), but under the current planning scheme, have found that these developments aren't financially viable, due to the constraints of the site yield, due to setbacks and height limits.

⁴ *The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance, 2013* and the associated series of Practice Notes provide a best practice standard for managing cultural heritage places in Australia, and can be found here: <https://australia.icomos.org/publications/burra-charter-practice-notes/>

⁵ The NSW's 'Design in Context: Guidelines for Infill Development in the Historic Environment' document can be found here: <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Heritage/design-in-context-guidelines-for-infill-development-historic-environment.pdf>, and the Victorian guides can be found here: Good Design + Heritage | ovga.vic.gov.au

It is unclear at this stage whether the proposed changes included in the Plan will alleviate these issues, and this would likely require testing. The Institute suggests there should be avenues built in for opportunities that do not comply with the rules, other than having to go to appeal during the planning process, which is costly for all involved. Some nuance should be allowed for, and incentives provided to encourage private development in the right locations with pay-offs that benefit the community.

For example, the creation of open usable public space is to be lauded at ground level, but certain sites would preclude this due to the scale or shape of the site, unless permission were to be given to go a little higher. A developer should be able to negotiate for a “rule” breaking component by offering another community beneficial aspect that somehow “pays” for the development. There are examples of this elsewhere. One such example occurred in Melbourne where the Princess Theatre was restored at the cost of a developer, and in return the developer was able to build additional floors on their building. This ability for nuance and negotiation may not necessarily be in relation to height, however this example has been used to illustrate the point.

The Institute suggests that the neighbourhood planning allow for some form of methodology for this kind of negotiation to allow for projects that don't specifically comply with the framework, to allow for benefits for both the neighbourhood and its people, and the site. Clever, well thought-out, and designed opportunities that give back to the neighbourhood and the public, have the potential to create a positive impact. These types of negotiations require a high-level of design intelligence to assess and would benefit from the assistance of the Urban Design Advisory Panel.

When considering building heights, we suggest that height limits could be expressed in storey limits, rather than in metres. We want to enable good design. Height limits expressed in meters could result in developers trying to squeeze in as many floors as possible to generate more saleable area, which would result in low-quality spaces (with low ceilings). If a storey limit was the datum instead, then developers could be allowed to create spaces that had generous floor to ceiling heights which in turn create better spaces to be in and remain within the rules.

Building Typologies

The Institute suggests that the Plan considers providing avenues for alternative building types, including courtyard models, which should be considered in the provision of medium-density developments. These models are used around the world and are space-efficient and allow for outdoor amenity in the middle of the property. Some of the planning controls in relation to setbacks preclude this type of development.

Indigenous Ecosystems Corridors and Nodes

The Institute commends the Plan incorporating consultation and input from the Tasmanian Aboriginal people, protecting Aboriginal heritage and supporting Aboriginal cultural expression. The Institutes suggests that the Plan could incorporate opportunities to create Indigenous ecosystems, corridors and nodes (IEC+N)⁶ to enhance parks and wildlife diversity areas, as well as restore urban areas with low flora and fauna diversity due to patterns of settlement since colonisation. This would be undertaken through consultation with people with relevant cultural and landscape expertise to achieve outcomes that are beneficial for biodiversity and restore Indigenous ecosystems across urban areas.

Dark Sky Lighting

The Institute suggests that the Plan incorporates DarkSky appropriate lighting⁷. This lighting minimises glare, reduces light trespass and doesn't pollute the night sky, and ensures a better outcome for both the users of the spaces, both fauna and human life forms, and the broader environment.

⁶ Find out more about IEC+N here: <https://acumen.architecture.com.au/environment/place/habitat-and-ecology/four-strategies-to-design-for-ecological-connectivity/> and https://www.uia-architectes.org/wp-content/uploads/2022/03/20201027_uia_ifla_iec_n_website_plan_ar_tw_ar2.pdf

⁷ Find out more about DarkSky lighting here: <https://darksky.org/what-we-do/darksky-approved/>

SURVEY RESPONSES

The Institute has completed the online survey and has included the comments submitted below.

Urban Design Principles

The Institute supports all the urban design principles that have been outlined in the document and the survey and has included the following comments:

- Along with ensuring well designed responses, consideration must be given to ensuring these are also well built.
- Ensure heritage responses are consistent with the articles of the Burra Charter.
- The Institute suggests incorporation of the principles of Indigenous ecosystems, corridors and nodes (IEC+N) to enhance parks and wildlife diversity areas, as well as restore urban areas with low flora and fauna diversity due to patterns of settlement since colonisation.
- Provision of DarkSky appropriate lighting.

Wide Streets

The Institute supports all uses, types of businesses, community facilities and elements outlined being included on the identified wide streets and has included the following comments (max 255 characters):

Also consider Indigenous ecosystems corridors and nodes as part of the provision of uses on wide streets, along with the provision of DarkSky appropriate lighting (see the written response submitted by the Institute for more info).

Condell Place car park site

The Institute supports all the outlined suggestions at the Condell Place car park site and has included the following comments (max 255 characters):

Also refer to the Institute's response to the Plan-Discussion Paper Survey 2023, as well as consideration of Indigenous Ecosystems Nodes and Corridors and DarkSky appropriate lighting. Architects should be involved in the formulation of a masterplan.

Elizabeth Street Vision Plan extension

The Institute supports all the outlined elements to be considered in the Elizabeth Street Vision Plan extension and has included the following comments (max 255 characters):

Also consider Indigenous ecosystems corridors and nodes as part of this Vision Plan, along with the provision of DarkSky appropriate lighting (see the written response submitted by the Institute for more info).

Providence Valley Rivulet Masterplan

The Institute supports a masterplan that investigates all the indicated priorities for the Providence Valley Rivulet parcels of land, and has included the following comments (max 255 characters):

Also consider Indigenous ecosystems corridors and nodes in the Masterplan, along with the provision of DarkSky appropriate lighting (see response submitted by the Institute for more info). Architects should be involved in the masterplan formulation.

North Hobart Oval Sports and Community Masterplan

The Institute supports a masterplan that investigates all the uses and elements outlined for the North Hobart Oval area, and has included the following comments (max 255 characters):

Also consider Indigenous ecosystems corridors and nodes in the Masterplan, along with the provision of DarkSky appropriate lighting (see response submitted by the Institute for more info). Architects should be involved in the masterplan formulation.

Ultimately, North Hobart needs to plan for a neighbourhood that values its past but is prepared for the future, whilst allowing for vision and innovation. These are fast-moving, dynamic times that require agility and problem solving, but we also respect the need for well thought-out and considered planning, that includes a whole-of-community approach. The quality of design affects how spaces and places function, is able to stimulate the economy, enhance the environment and improve wellbeing. Good design adds value for all people and can play a transformative role in the lives of every person.

The Institute commends the constructive and consultative approach the City of Hobart is taking to develop a plan for North Hobart for the future. The Institute looks forward to seeing how the Plan progresses and would welcome the opportunity to discuss any of the above further. If we can be of any assistance, please don't hesitate to contact us.

Kind regards,



Daniel Lane
President, Tasmanian Chapter
Australian Institute of Architects



Jennifer Nichols
Executive Director, Tasmanian Chapter
Australian Institute of Architects

The Australian Institute of Architects (Institute) is the peak body for the architectural profession in Australia. It is an independent, national member organisation with over 14,500 members across Australia and overseas. The Institute exists to advance the interests of members, their professional standards and contemporary practice, and expand and advocate the value of architects and architecture to the sustainable growth of our communities, economy and culture. The Institute actively works to maintain and improve the quality of our built environment by promoting better, responsible and environmental design. To learn more about the Institute, log on to www.architecture.com.au.